

United States Courts  
Southern District of Texas  
FILED

APR 25 2019

David J. Bradley, Clerk of Court

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

UNITED STATES OF AMERICA

S

v.

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

S

money throughout the United States and affects interstate commerce.

At all times material to this Indictment, La Moreliana, is a San Antonio, Texas, United States based company engaged in the business of retail purchase and sales of food and consumer goods which are shipped in interstate commerce, sends and receives money throughout the United States and affects interstate commerce.

At all times material to this Indictment, DolEx Dollar Express Inc, herein DolEx, is an Arlington, Texas based non-banking financial business that has stores throughout the United States. Specifically, in this indictment, DolEx operates a store front within La Moreliana. DolEx is engaged in the business of non-banking financial services and operates with United States and foreign currencies, which travel in interstate commerce and which affect interstate commerce.

COUNT ONE

Title 18, United States Code, §§ 1951(a) - Interference with Commerce by Robbery

On or about January 14, 2019, in the Houston Division of the Southern District of Texas,

DEVONTE RANSOM

herein defendant, did knowingly and intentionally obstruct, delay, and affect interstate commerce and the movement of articles and commodities in commerce by means of robbery, as the terms "commerce" and "robbery" are defined in Title 18, United States Code, §§ 1951(b)(1) and (b)(3), in that the defendant did unlawfully take and obtain the property of La Miscelanea, located at 5328 Antoine Drive, Houston, Texas, which was in the possession and custody of an employee of La Miscelanea, namely, United States Currency, by means of actual and threatened force, violence, and fear of injury to those in lawful possession of those items.

In violation of Title 18, United States Code, §§ 1951(a).

COUNT TWO

Title 18, United States Code, §§ 924(c)(1)(A) -  
Use, Carry, Brandish and Discharge of a firearm during and in  
relation to a crime of violence

On or about January 14, 2019, in the Houston Division of the Southern District of Texas,

DEVONTE RANSOM

herein defendant, did knowingly use, carry, brandish and discharge a firearm, namely a handgun, during and in relation to a crime of violence for which they may be prosecuted in a court of the United

States, that being Interfering with Commerce by Robbery, as set forth in Count One.

In violation of Title 18, United States Code, §§ 924 (c) (1) (A) (ii), (3) (A).

COUNT THREE

Title 18, United States Code, §§ 1951(a) and §§2 - Aiding and Abetting Interference with Commerce by Robbery

On or about February 5, 2019, in the Houston Division of the Southern District of Texas,

DEVONTE RANSOM and CHARLES JOHNSON

herein defendants, aiding and abetting each other and others unknown to the Grand Jury, did knowingly and intentionally obstruct, delay, and affect interstate commerce and the movement of articles and commodities in commerce by means of robbery, as the terms "commerce" and "robbery" are defined in Title 18, United States Code, §§ 1951(b) (1) and (b) (3), in that the defendants did unlawfully take and obtain the property of La Michoacana, located at 10092 Veterans Memorial, Houston, Texas, which was in the possession and custody of an employee of La Michoacana, namely, United States currency, by means of actual and threatened force,

violence, and fear of injury to those in lawful possession of those items.

In violation of Title 18, United States Code, §§ 1951(a) and 2.

COUNT FOUR

Title 18, United States Code, §§ 924(c)(1)(A) and §§2 - Aiding and Abetting Use, Carry, Brandish and Discharge of a firearm during and in relation to a crime of violence

On or about February 5, 2019, in the Houston Division of the Southern District of Texas,

DEVONTE RANSOM and CHARLES JOHNSON

herein defendants, aiding and abetting each other and others unknown to the grand jury, did knowingly use, carry, brandish and discharge a firearm, namely a handgun, during and in relationship to a crime of violence for which they may be prosecuted in a court of the United States, that being Aiding and Abetting Interference with Commerce by Robbery, as alleged in Count Three.

In violation of Title 18, United States Code, §§ 924(c)(1)(A)(ii), (3)(A), and 2.

COUNT FIVE

Title 18, United States Code, §§ 1951(a) and §§2 - Aiding and  
Abetting Interference with Commerce by Robbery

On or about February 17, 2019, in the Houston Division of the Southern District of Texas,

DEVONTE RANSOM, CHARLES JOHNSON and BRANDON JOHNSON herein defendants, aiding and abetting each other and others unknown to the grand jury did knowingly and intentionally obstruct, delay, and affect interstate and foreign commerce and the movement of articles and commodities in commerce by means of robbery, as the terms "commerce" and "robbery" are defined in Title 18, United States Code, §§ 1951(b)(1) and (b)(3), in that the defendant did unlawfully take and obtain the property of La Moreliana, located at 7306 Tidwell Road, Houston, Texas, which was in the possession and custody of an employee of La Moreliana, namely, United States currency, by means of actual and threatened force, violence, and fear of injury to those in lawful possession of those items.

In violation of Title 18, United States Code, §§ 1951(a) and 2.

COUNT SIX

Title 18, United States Code, §§ 924(c)(1)(A) and §§2 - Aiding and Abetting Use, Carry and Brandish of a firearm during and in relation to a crime of violence

On or about February 17, 2019, in the Houston Division of the Southern District of Texas,

CHARLES JOHNSON and BRANDON JOHNSON

herein defendants, aiding and abetting each other and others unknown to the grand jury did knowingly use, carry and brandish a firearm, namely, a handgun, during and in relationship to a crime of violence for which they may be prosecuted in a court of the United States, that being Aiding and Abetting Interference with Commerce by Robbery, as alleged in Count Five.

In violation of Title 18, United States Code, §§ 924(c)(1)(A)(ii), (3)(A) and 2.

COUNT SEVEN

Title 18, United States Code, §§ 1951(a) and §§2 - Aiding and Abetting Interference with Commerce by Robbery

On or about February 17, 2019, in the Houston Division of the Southern District of Texas,

DEVONTE RANSOM, CHARLES JOHNSON and BRANDON JOHNSON herein defendants, aiding and abetting each other and others unknown to the grand jury did knowingly and intentionally obstruct,

delay, and affect interstate and foreign commerce and the movement of articles and commodities in commerce by means of robbery, as the terms "commerce" and "robbery" are defined in Title 18, United States Code, §§ 1951(b)(1) and (b)(3), in that the defendant did unlawfully take and obtain the property of DolEx, located at 7306 Tidwell Road, Houston, Texas, which was in the possession and custody of an employee of DolEx, namely, United States currency, by means of actual and threatened force, violence, and fear of injury to those in lawful possession of those items.

In violation of Title 18, United States Code, §§ 1951(a) and 2.

COUNT EIGHT

Title 18, United States Code, §§ 924(c)(1)(A) and §§2 - Aiding and Abetting Use, Carry and Brandish of a firearm during and in relation to a crime of violence

On or about February 17, 2019, in the Houston Division of the Southern District of Texas,

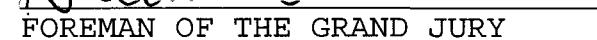
DEVONTE RANSOM, CHARLES JOHNSON and BRANDON JOHNSON herein defendants, aiding and abetting each other and others unknown to the grand jury did knowingly use, carry and brandish a firearm, namely, a handgun, during and in relationship to a crime of violence for which they may be prosecuted in a court of

the United States, that being Aiding and Abetting Interference with Commerce by Robbery, as alleged in Count Seven.

In violation of Title 18, United States Code, §§ 924(c)(1)(A)(ii), (3)(A) and 2.

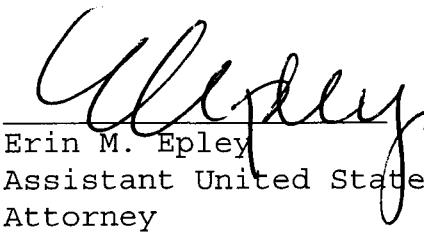
A TRUE BILL:

Original signature on File

  
\_\_\_\_\_  
FOREMAN OF THE GRAND JURY

RYAN K. PATRICK  
United States Attorney

BY:

  
\_\_\_\_\_  
Erin M. Epley  
Assistant United States  
Attorney